

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Pacific Union Financial, LLC,	)	Case No. 18-cv-00273-JNE/FLN
	)	
Plaintiff,	)	
	)	
vs.	)	<b>DECLARATION OF</b>
	)	<b>SAMUEL W. DIEHL</b>
David C. Dingman, Scott C. Smith,	)	
Nicholas W. Brownell, and Cardinal	)	
Financial Company, John Does 1	)	
through 10,	)	
	)	
Defendants.	)	
	)	

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I, Samuel W. Diehl, declare and state as follows:

1. I am a Shareholder of Gray, Plant, Mooty, Mooty & Bennett, P.A. (“GPM”), Counsel for Defendant Cardinal Financial Company (“Cardinal”). I submit this declaration in support of Cardinal’s Motion to Dismiss. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. Attached as **Exhibit 1** is a copy of the complaint in *Pacific Union Financial, LLC v. David C. Dingman, Scott C. Smith, Nicholas W. Brownell*, Hennepin County Case No. 27-CV-18-329 (filed by Pacific Union on January 5, 2018, voluntarily dismissal filed by Pacific Union on January 26, 2018).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 21, 2018 at Minneapolis, Minnesota.

s/ Samuel W. Diehl  
Samuel W. Diehl

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